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10 Attorneys for Defendants  
11 KARYN GRIME; RAYMOND PLATT;  
12 AND CITY OF LOS ANGELES, Acting by  
13 and through the DEPARTMENT OF  
14 WATER AND POWER

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

SARAH ROPER

Plaintiff,

vs.

KEITH POMA, *et al.*

Defendants.

CASE NO. CV-07-0316 CAS (Ex)

**STIPULATED PROTECTIVE ORDER**

Hon. CHARLES F. EICK

Discovery Cut-Off: 2/22/08  
Pre-Trial Conference: 9/8/08  
Trial Date: 9/23/08

Subject to approval of this Court, the parties hereby stipulate through their counsel to the following protective order:

1. The parties hereto will be producing, pursuant to discovery, documents deemed confidential under California state law, *i.e.*, employment information, and medical and psychological information. Such documents shall hereinafter be referred to as "Confidential Information". The parties agree that the following terms and conditions of this Protective Order shall govern the use and disclosure of Confidential Information and information derived therefrom:

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1           2. Under no circumstances shall Confidential Information be used in any  
2 proceeding other than the instant case or be disseminated, in any form, except by Court  
3 order; except that if the Court deems that other cases are related to this litigation, such  
4 Confidential Information may be used in such other related proceeding.

5           3. Disclosure of Confidential Information shall be limited to the personnel  
6 and/or classification of persons listed below:

- 7           (a) Counsel for any party to this action;  
8           (b) Staff personnel employed by counsel for any party;  
9           (c) The Court and its personnel, in connection with this litigation;  
10          (d) Experts or consultants retained to work on this case by counsel for any party  
11 to this case; and  
12          (e) Investigators retained by counsel for any party to this case.

13          4. Counsel for any party to this action shall advise those individuals to whom  
14 disclosure of Confidential Information is to be made of the contents of this Protective  
15 Order, and such counsel shall obtain the consent of such individual that he or she will  
16 be bound by this Protective Order. In the event such individual does not consent to be  
17 bound by this Protective Order, no disclosure of Confidential Information will be made  
18 to such individual.

19          5. Any counsel, expert, consultant or investigator retained by counsel for any  
20 party to this case shall not refer to Confidential Information in any other court  
21 proceeding, except for related cases, if any, subject to further order of this Court.

22          6. This Protective Order, and the obligations of all persons thereunder,  
23 including those relating to the disclosure and use of Confidential Information, shall  
24 survive the final termination of this case, whether such termination is by settlement,  
25 judgment, dismissal, appeal or otherwise, until further order of the Court.

26          7. Nothing in this Protective Order is intended to prevent officials or employees  
27 of the parties, or other authorized individuals, from having access to Confidential  
28 Information to which they would have had access in the normal course of their duties.

1 8. Documents containing Confidential Information to be considered in  
 2 connection with motions and other filings shall be lodged separately from documents  
 3 filed and, in accordance with Local Rule 79-5.1, be accompanied by a written  
 4 application asking that any party, including the moving or filing party, be given the  
 5 opportunity to request or oppose sealing the Confidential Information, in whole or in  
 6 part. Any party may propose or oppose the sealing of all or part of such documents.  
 7 Any motion, other filing, or lodging in such matters shall be electronically or  
 8 personally served, as shall all responsive or reply documents, which service shall  
 9 include both the documents related to sealing and filed documents related to the  
 10 underlying motion or other filing. The court shall direct whether, and if so to what  
 11 extent, documents containing Confidential Information shall be sealed.

12  
 13 SO STIPULATED:

14 DATED: Jan 23 2008

LAW OFFICES OF PATRICIA J. BARRY

15  
 16   
 17 By: PATRICIA J. BARRY

18 Attorneys for Plaintiff, SARAH ROPER

19  
 20 DATED: \_\_\_\_\_

21 ROCKARD J. DELGADILLO, City Attorney  
 22 RICHARD M. BROWN, General Counsel,  
 23 Water and Power  
 24 ANAT EHRLICH, Assistant City Attorney

25 By: JED M. SILVERSTROM

26 Attorneys for Defendants, KARYN GRIME;  
 27 RAYMOND PLATT; AND CITY OF LOS  
 28 ANGELES, Acting by and through the  
 DEPARTMENT OF WATER AND POWER

8. Documents containing Confidential Information to be considered in connection with motions and other filings shall be lodged separately from documents filed and, in accordance with Local Rule 79-5.1, be accompanied by a written application asking that any party, including the moving or filing party, be given the opportunity to request or oppose sealing the Confidential Information, in whole or in part. Any party may propose or oppose the sealing of all or part of such documents. Any motion, other filing, or lodging in such matters shall be electronically or personally served, as shall all responsive or reply documents, which service shall include both the documents related to sealing and filed documents related to the underlying motion or other filing. The court shall direct whether, and if so to what extent, documents containing Confidential Information shall be sealed.

SO STIPULATED:

DATED: \_\_\_\_\_ LAW OFFICES OF PATRICIA J. BARRY

By: PATRICIA J. BARRY

Attorneys for Plaintiff, SARAH ROPER

DATED: 1/25/08 ROCKARD J. DELGADILLO, City Attorney  
RICHARD M. BROWN, General Counsel,  
Water and Power  
ANAT EHRLICH, Assistant City Attorney

By: JED M. SILVERSTROM

Attorneys for Defendants, KARYN GRIME;  
RAYMOND PLATT; AND CITY OF LOS  
ANGELES, Acting by and through the  
DEPARTMENT OF WATER AND POWER

1 DATED: 1/25/08

MANNING & MARDER, KASS, ELLROD,  
RAMIREZ LLP

2  
3  
4 By: MILDRED K O'LINN 

5 Attorneys for Defendant, KEITH POMA

6  
7 DATED: \_\_\_\_\_

GUTIERREZ, PRECIADO & HOUSE

8  
9  
10 By: ANN D. WU

11 Attorneys for Defendant, THOMAS AKE

12 APPROVED AND SO ORDERED:

13 DATED: 1/29/08

14   
15 By: MAGISTRATE JUDGE CHARLES F. EICK

1 DATED: \_\_\_\_\_  
2  
3

MANNING & MARDER, KASS, ELLROD,  
RAMIREZ LLP

4 \_\_\_\_\_  
5 By: MILDRED K. O'LINN

6 Attorneys for Defendant, KEITH POMA

7  
8 DATED: 1/21/08

GUTIERREZ, PRECIADO & HOUSE

9   
10 \_\_\_\_\_  
11 By: ANN D. WU

12 Attorneys for Defendant, THOMAS AKE

13 APPROVED AND SO ORDERED:

14 DATED: \_\_\_\_\_

15 By: MAGISTRATE JUDGE CHARLES F. EICK  
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**PROOF OF SERVICE**

I am employed in the County of Los Angeles; I am over the age of eighteen years and am not a party to the within entitled action; my business address is 111 North Hope Street, Suite 340, Los Angeles, California 90012-2694. On January 28, 2008, I served the within document:

**STIPULATED PROTECTIVE ORDER**

by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date.

X by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.

by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

**Christy L. O'Donnell**  
**MANNING & MARDER**  
**KASS, ELLROD, RAMIREZ LLP**  
**15th Floor at 801 Tower**  
**801 South Figueroa Street**  
**Los Angeles, CA 90017**  
**Attorneys for Defendant KEITH POMA**

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on January 28, 2008, at Los Angeles, California.

/S/ \_\_\_\_\_  
Yvette Furr